

**IN THE DISTRICT COURT OF BLAINE COUNTY
STATE OF OKLAHOMA**

BLAINE COUNTY, OKLAHOMA

F I L E D

SEP 18 2023

CHRISTY MATLI, CT. CLERK
BY _____
DEPUTY

DDL OIL & GAS, LLC)
and DUSTIN M. FREEMAN,)
)
Plaintiffs,)
)
v.)
)
DIVERSIFIED PRODUCTION, LLC,)
successor by merger with)
TAPSTONE ENERGY, LLC,)
)
Defendant.)

Case No. CJ-2019-17

**SUPPLEMENTAL DECLARATION OF JENNIFER M. KEOUGH ON BEHALF OF
SETTLEMENT ADMINISTRATOR, JND LEGAL ADMINISTRATION LLC,
REGARDING NOTICE MAILING AND ADMINISTRATION OF SETTLEMENT**

I, JENNIFER M. KEOUGH, declare and state as follows:

1. I am the Chief Executive Officer and President of JND Legal Administration (“JND”).¹ This Declaration is based on my personal knowledge, as well as information provided to me by experienced JND employees. If called upon to do so, I could and would testify competently thereto.

2. On August 16, 2023, I executed my Declaration of Jennifer M. Keough on Behalf of Settlement Administrator, JND Legal Administration, LLC, Regarding Notice Mailing and Administration of Settlement. I submit this Supplemental Declaration to update the Court regarding developments since that time.

NOTICE MAILING

3. As of the date of this Declaration, JND has tracked 542 notices that have been returned to JND as undeliverable at the address provided. JND re-mailed a total of 132 notices to

¹ Capitalized terms used and otherwise not defined in this Declaration shall have the meanings given to such terms in the Settlement Agreement or Preliminary Approval Order.

forwarding addresses provided by USPS. For the remaining undeliverable notices, JND conducted advanced address research through TransUnion's TLO service, which located updated addresses for 115 Class Members. JND duly re-mailed the Notice of Settlement to those potential Class members for whom a new address was obtained. As of the date of this Declaration, 19 of the notices that were forwarded or re-mailed in this manner have been returned as undeliverable, of which one (1) was returned with a forwarding address and was promptly re-mailed. This equates to a delivery rate to the Class Mailing List of 97.26%.

SETTLEMENT WEBSITE

4. As of the date of this Declaration, the website has tracked 298 unique users with 824 pageviews. JND will continue to update and maintain the website throughout the administration process and final approval process.

TOLL-FREE INFORMATION LINE

5. As of the date of this Declaration, the toll-free number has received 67 calls.

REQUESTS FOR EXCLUSION

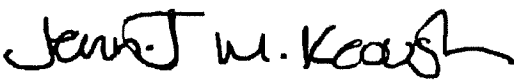
6. As of the date of this Declaration, JND has received a Request for Exclusion for thirteen (13) Class Members. A list of the owners requesting exclusion is attached hereto as **Exhibit A**.

OBJECTIONS

7. As of the date of this Declaration, JND is not aware of any objections.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on September 13, 2023, at Seattle, Washington.

BY: 

JENNIFER M. KEOUGH

Exhibit A



DDL OIL & Gas, LLC and Dustin M. Freeman v. Tapstone Energy, LLC.

Case No. CJ-2019-17 (Okla. Dist. - Blaine County)

Requests for Exclusion Received

ID	Name	Received	Postmarked
900405	G B K CORP	8/11/2023	8/7/2023
900406	GBK CORPORATION	8/11/2023	8/7/2023
900407	KAISER-FRANCIS OIL COMPANY	8/11/2023	8/7/2023
900410	MAGNUS CORPORATION	8/11/2023	8/7/2023
901256	RUTH K NELSON TRUST	8/11/2023	8/7/2023
903456	GBK INVESTMENTS LLC	8/11/2023	8/7/2023
903463	KAISER-FRANCIS OIL COMPANY	8/11/2023	8/7/2023
904199	TRUST DTD 9-15-1969 FBO PAMELA BLAIR NELSON	8/11/2023	8/7/2023
901858	JMA ENERGY COMPANY LLC	8/14/2023	8/9/2023
901978	TOWER ROYALTY COMPANY LLC	8/14/2023	8/9/2023
903429	AUGUSTA ENERGY COMPANY LLC	8/14/2023	8/9/2023
904391	SAWTOOTH ENERGY COMPANY LLC	8/14/2023	8/9/2023
908205	WALTER DALE STIDHAM	8/30/2023	8/26/2023